

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____	:	
RHONDA HALL,	:	
	:	
Plaintiff,	:	
	:	
V.	:	Civil Action No. 3:05-cv-30002-MAP
	:	
VERIZON COMMUNICATIONS, INC.,	:	
and VERIZON NEW ENGLAND, INC.	:	
	:	
Defendants.	:	
_____	:	

MOTION OF PLAINTIFF RHONDA HALL
FOR AN EXTENSION OF TIME TO FILE OPPOSITION TO
DEFENDANTS' MOTION *IN LIMINE* AND TO
DISQUALIFY PLAINTIFF'S COUNSEL

The Plaintiff respectfully moves this Court for an extension of time until Friday, May 11, 2007 to file her opposition to the Defendant's pending motions to disqualify Plaintiff's counsel and *in limine*. As grounds for this motion, Plaintiff states:

1. The Defendant has filed two separate motions. The first is a motion to disqualify Plaintiff's counsel on the grounds that he is a necessary witness due to two letters he sent to the Defendant's EEO officer during the course of his representation of the Plaintiff. The second is a motion *in limine* to exclude certain evidence of racist graffiti on the interior of a "cross box" maintained by the Defendants.

2. The Plaintiff's opposition to the Defendant's motion to disqualify Plaintiff's counsel is presently due on May 4, 2007 under the court's order dated

April 5, 2007. Motions *in limine* were not due until a week before the trial in this matter.

3. Plaintiff's counsel has been actively preparing for a two week trial in this court which was scheduled to proceed on Tuesday, May 8, 2007, and was just continued to a date in June. Plaintiff's counsel was also not anticipating having to respond to a motion *in limine* at this early date. Other pressing scheduling demands over the past two weeks have further interfered with Plaintiff's counsel's ability to complete the Plaintiff's opposition without the requested extension.

7. Plaintiff's counsel has been advised by Stacy Smith Walsh, counsel for the Defendants, that the Defendants have no objection to the extension sought in this motion.

Respectfully submitted,
PLAINTIFF RHONDA HALL
By her Attorney,

Dated: May 4, 2007

/s/ Hugh D. Heisler
Hugh D. Heisler, Esq.
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CERTIFICATE OF SERVICE

I, Hugh D. Heisler, hereby certify that true copies of the foregoing Motion were electronically served upon the attorney of record for the Defendants on May 4, 2007.

/s/ Hugh D. Heisler
Hugh D. Heisler